Matthew D. O'Conner, WSBA 27061
Law Office of Matthew D. O'Conner
8011 Greenwood Ave. North
Seattle, WA 98103
Tel: (206) 782-0722
Fax: (206) 738-0233

Honorable Judge Samuel J. Steiner
DATE: December 17, 2010
TIME: 9:30 a.m.
Chapter 11
LOCATION: Seattle

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

In re: Adam R. Grossman, Debtor.	CHAPTER 11 BANKRUPTCY CASE NO. 10-19817-SJS DECLARATION OF DEBTOR-IN-POSSESSION IN OPPOSITION TO BORODIN'S MOTION FOR ORDER FOR APPOINTMENT OF CHAPTER 11 TRUSTEE

I, Adam R. Grossman, declare the following:

1. I am the Debtor in this proceeding.

2. I no longer oppose the appointment of a trustee in this proceeding.

3. However, due to acts of the Moving Party in the Motion to Appoint Chapter 11 Trustee, Jill Borodin, I cannot comply with the US Trustee's request for the production of documents.

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4. As has been stated many times in our recent dissolution proceeding (King County Superior Court case no. is 09-2-02955-9), some time after I moved out of the family house, Ms. Borodin, without my knowledge or permission either moved or destroyed most if not all of my paperwork on which I could have complied with the US Trustee's request for the production of documents.

5. Pursuant to a ruling dated Tuesday, December 14, 2010 in the above mentioned dissolution proceeding, I am now divorced from Jill Borodin.

6. Furthermore, I am in the final stages of negotiating a job which will provide income that would be a steady source of income to pay my creditors and remedy my financial situation without the need for protection from the bankruptcy court.

7. I further believe that as the above-mentioned dissolution proceeding has been finalized, my extraordinary costs related to it are now over, thus allowing the funds from the above mentioned job to be applied towards my debts.

8. Accordingly, as I will not be able to produce the documentation that the US Trustee seeks, I believe that the best course would be for the Court to dismiss this case.

I declare under penalty of perjury under the laws of the State of Washington that the foregoing statements are true and correct to the best of my information and knowledge.

DATED this 17th day of December, 2010.

A. Grossman

Adam R. Grossman
Debtor-in-Possession

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